

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON, *
ROSALIE WEISFELD, AUSTIN *
JUSTICE COALITION, *
COALITION OF TEXANS WITH *
DISABILITIES, MOVE TEXAS *
CIVIC FUND, LEAGUE OF *
WOMEN VOTERS OF TEXAS, *
and AMERICAN GI FORUM OF *
TEXAS, INC., *

*
Plaintiffs,

*
VS.

*
TEXAS SECRETARY OF *
STATE, TRUDY HANCOCK, IN *
HER OFFICIAL CAPACITY AS *
BRAZOS COUNTY ELECTIONS *
ADMINISTRATOR, AND PERLA *
LARA IN HER OFFICIAL *
CAPACITY AS CITY OF *
MCALLEN, TEXAS *
SECRETARY,

*
Defendants.

* CIVIL ACTION NUMBER
5:19-cv-0963

Remote Oral Deposition of
Austin Justice Coalition,
By and through their Designated Representative,

LARISSA RODIONOV

May 20, 2020

10:16 a.m.

Reported by:

Micheal A. Johnson, RDR, CRR

25

1 [REDACTED] [REDACTED]

2 Q. Has AJC had any prior dealings with the
3 Texas Secretary of State's office?

4 A. No.

5 Q. How about Perla Lara, the McAllen city
6 secretary?

7 A. No.

8 Q. And how about Trudy Hancock, the Brazos
9 County election administrator?

10 A. No.

11 [REDACTED] [REDACTED] [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED] [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED] [REDACTED]

25 [REDACTED]

68

1 [REDACTED] [REDACTED]
2 [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]

9 Q. Do you know if you ever -- if the Austin
10 Justice Coalition ever assisted a voter to register
11 to vote in a McAllen election?

12 MR. KALAR: Object to form.

13 BY MR. TAWIL:

14 Q. Let me limit that in time. Since 2017?

15 MR. KALAR: Same objection.

16 A. In McAllen, specifically for a McAllen
17 city election?

18 BY MR. TAWIL:

19 Q. Any election in McAllen.

20 A. Again, I can't say for certain. I don't
21 know where all the people have come from.

22 Q. Has anybody that voted by mail in an
23 election in McAllen ever reached out to the Austin
24 Justice Coalition for assistance as a result of any
25 issue related to the ballot by mail that they cast?

1 MR. KALAR: Objection to form.

2 A. No.

3 THE WITNESS: Sorry.

4 A. No.

5 BY MR. TAWIL:

6 Q. Has the Austin Justice Coalition ever
7 visited a detention facility in McAllen, Texas?

8 A. No.

9 Q. Has the Austin Justice Coalition ever
10 visited a detention facility in Hidalgo County?

11 A. No.

12 Q. Do you know if the Austin Justice
13 Coalition has ever had any interaction with Perla
14 Lara, who is the city secretary of the City of
15 McAllen, since 2017?

16 A. No.

17 Q. Has the Austin Justice Coalition
18 communicated with the City of McAllen city
19 secretary's office since 2017 regarding mail-in
20 ballots?

21 A. No.

22 [REDACTED] [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

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CAPACITY AS CITY OF *
MCALLEN, TEXAS *
SECRETARY, *

Defendants. *

CIVIL ACTION NUMBER
5:19-cv-0963

Remote Oral Deposition of

Coalition of Texans with Disabilities,

By and through their Designated Representative,

CHASE BEARDEN

May 19, 2020

10:05 a.m.

Reported by:

Micheal A. Johnson, RDR, CRR

24

1 [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED]
12 [REDACTED] [REDACTED]
13 [REDACTED]
14 [REDACTED] [REDACTED]
15 [REDACTED] [REDACTED]
16 [REDACTED] [REDACTED]
17 [REDACTED]
18 [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED]
20 [REDACTED]
21 [REDACTED] [REDACTED]
22 [REDACTED]
23 Q. Okay. That's fine. All right. Has the
24 Coalition of Texans With Disabilities had any prior
25 dealings with Perla Lara or the McAllen city

25

1 secretary?

2 A. No.

3 [REDACTED]
4 [REDACTED]
5 [REDACTED] [REDACTED]
6 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
7 [REDACTED] [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED] [REDACTED]
13 [REDACTED] [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED] [REDACTED]
17 [REDACTED]
18 [REDACTED] [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED] [REDACTED]
22 [REDACTED] [REDACTED]
23 [REDACTED]
24 [REDACTED] [REDACTED]
25 [REDACTED]

78

1 [REDACTED]
2 [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED]
5 [REDACTED] [REDACTED]
6 [REDACTED]
7 [REDACTED] [REDACTED]

8 Q. Any of the individuals you mentioned in
9 response to Mr. Magee's questions, do any of them
10 vote in McAllen elections, McAllen city elections?

11 A. No.

12 [REDACTED] [REDACTED]
13 [REDACTED] [REDACTED]
14 [REDACTED] [REDACTED]
15 [REDACTED]
16 [REDACTED] [REDACTED] [REDACTED]
17 [REDACTED]
18 [REDACTED] [REDACTED]
19 [REDACTED]
20 [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED] [REDACTED]
25 [REDACTED]

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WOMEN VOTERS OF TEXAS, and)
AMERICAN GI FORUM OF)
TEXAS, INC.,)
Plaintiffs,)
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vs.) CASE NO. 5:19-cv-00963
)
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TRUDY HANCOCK, IN HER)
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BRAZOS COUNTY ELECTIONS)
ADMINISTRATOR, AND PERLA)
LARA IN HER OFFICIAL)
CAPACITY AS CITY OF)
MCALLEN, TEXAS SECRETARY,)
Defendants.)

ORAL AND VIDEO DEPOSITION

DR. GEORGE RICHARDSON

MAY 13, 2020

(REPORTED REMOTELY)

35

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED] [REDACTED]
21 [REDACTED]
22 [REDACTED] [REDACTED]
23 Q. Have you had any prior dealings with Perla Lara
24 or the McAllen city secretary?
25 A. City of Bryan or College Station?

1 Q. So I was going to ask that one next, but I'm
2 just -- I just want to cover all the defendants in this
3 lawsuit. So Perla Lara is the City of McAllen, Texas,
4 secretary. And so --

5 A. Oh.

6 Q. -- I was wondering if you had familiarity with
7 her or with that office.

8 A. Okay. No. No.

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

51

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED] [REDACTED]
6 [REDACTED] [REDACTED]
7 [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED] [REDACTED]
12 [REDACTED] [REDACTED]
13 [REDACTED] [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED]
20 [REDACTED] [REDACTED]
21 [REDACTED]
22 Q. (BY MR. TAWIL) Dr. Richardson, my name is
23 Isaac Tawil. I'm an attorney representing Perla Lara in
24 this lawsuit. You don't have any complaints about Perla
25 Lara or the City of McAllen, do you?

1 A. Who are you?

2 Q. I'm an attorney representing the City of
3 McAllen --

4 A. Okay.

5 Q. -- and Perla Lara, who is a defendant in this
6 lawsuit. You don't have any complains about Perla Lara,
7 do you --

8 MR. MIRZA: Objection.

9 A. No.

10 Q. (BY MR. TAWIL) -- as it relates to your --
11 your ballot?

12 MR. MIRZA: Objection.

13 Go ahead. You can answer.

14 A. I don't think so. No.

15 [REDACTED] [REDACTED]

16 [REDACTED]

17 [REDACTED] [REDACTED]

18 [REDACTED] [REDACTED]

19 [REDACTED] [REDACTED]

20 [REDACTED]

21 [REDACTED] [REDACTED]

22 [REDACTED] [REDACTED]

23 [REDACTED]

24 [REDACTED]

25

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ORAL AND VIDEO DEPOSITION

ROSLIE WEISFELD

MAY 13, 2020

(REPORTED REMOTELY)

63

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED] [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED] [REDACTED]
20 [REDACTED] [REDACTED] [REDACTED]

21 Q. And why didn't you send a copy of this e-mail
22 to anyone at the City of McAllen Secretary's Office?

23 A. The only thing I can remember is that after I
24 became a client of the Texas Civil Rights Project they
25 said they would take care of -- they -- they would --

1 they would represent me and communicate with those --
2 they would communicate as necessary with -- regarding
3 the case, regarding what happened to me.

4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

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CAPACITY AS CITY OF *
MCALLEN, TEXAS *
SECRETARY,

*
Defendants.

* CIVIL ACTION NUMBER
5:19-cv-0963

Remote Oral Deposition of
League of Women Voters of Texas,
By and through their Designated Representative,

GRACE CHIMENE

May 18, 2020

10:08 a.m.

Reported by:

Micheal A. Johnson, RDR, CRR

25

1 [REDACTED] [REDACTED]

2 [REDACTED] [REDACTED]

3 [REDACTED] [REDACTED]

4 [REDACTED] [REDACTED] [REDACTED]

5 [REDACTED]

6 Q. And how about -- to your knowledge, has
7 the League of Women Voters of Texas had any prior
8 dealings with the City of McAllen's secretary?

9 A. No.

10 Q. What about the --

11 A. No.

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED] [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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Defendants.

* CIVIL ACTION NUMBER
5:19-cv-0963

Remote Oral Deposition of

MOVE Texas Civic Fund,

By and through their Designated Representative,

HILLIARD DREW GALLOWAY

May 22, 2020

10:02 a.m.

Reported by:

Micheal A. Johnson, RDR, CRR

24

1 [REDACTED] [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED]
6 [REDACTED] [REDACTED]
7 [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED] [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED] [REDACTED]
17 [REDACTED] [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]

22 Q. Has the -- has MOVE Texas Civic Fund had
23 any prior dealings with Perla Lara or the McAllen
24 city secretary?

25 A. No, not to my knowledge.

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 Q. Do you have volunteers at Hidalgo County?

5 I know you said there's not a physical presence as
6 in an office, but do you send volunteers down on an
7 occasional basis?

8 A. To my knowledge, we have not -- we do not
9 volunteer in Hidalgo County at this time.

10 Q. Okay. Has MOVE Civic Fund had any
11 contact or communication with Perla Lara in her
12 official capacity as the McAllen city secretary?

13 A. Not to my knowledge.

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED] [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED] [REDACTED] [REDACTED]

24 [REDACTED]

25 [REDACTED] [REDACTED] [REDACTED]